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FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

November 18, 2019

Via ECF and Email

The Honorable Debra A. Batts
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: U.S. v. Henry Fermin; 18 Cr. 657 (DAB)

Dear Judge Batts:

Counsel represents Henry Fermin in the above-referenced matter, pursuant to the Criminal Justice Act. I write to respectfully request that your Honor adjust the current schedule for submitting sentencing memoranda, in light of the Court's recent adjournment of Mr. Fermin's sentencing until April 14, 2020.

Together with the government, we propose that sentencing submissions on behalf of: (1) GRANTED Mr. Fermin shall be filed no later than March 1, 2020; (2) the government shall be filed no later than March 14, 2020; and, (3) any defense reply, shall be filed no later than March 20, 2020. 11/20/19

The Court's attention to this request is appreciated.

Respectfully submitted,

/s/

Susan G. Kellman

cc: All Counsel

SO ORDERED



Deborah A. Batts
United States District Judge

May 20, 2019